

EXHIBIT 3

REQUESTS STILL IN DISPUTE IN CONNECTION WITH TRUSTEE'S SECOND SET OF REQUESTS FOR ADMISSION TO DEFENDANT STANLEY SHAPIRO

- Those Requests to which there is no dispute between the parties are omitted from below.
- Those Requests which the Trustee is holding in abeyance are also omitted from below.
- Those Requests the Trustee maintains as originally drafted are repeated below.

RELEVANT DEFINITIONS

1. The “**Portfolio Account**” means BLMIS Account No. 1SH028, which at various times had one or more subaccounts, including 1-SH028-3, 1-SH028-4, and 1SH028-8, and was originally numbered Account No. 1-03065, which at various times had one or more subaccounts, including 1-03065-3-0 and 1-03065-7-0.

2. The “**Split-Strike Account**” means the BLMIS Account No. 1S0306, which at various times had one or more subaccounts, including 1-S0306-3-0 and 1S0306-4-0.

3. “**BLMIS**” means Bernard L. Madoff Investment Securities LLC.

4. “**Transfer(s)**” means any conveyance, transmittal, disposition, remittance, payment, or payments by BLMIS by any means including, but not limited to, cash, funds, property, or other value conveyed by check, wire transfer, debit, credit to an account, the return of property, withdrawal from the Portfolio Account or the Split-Strike Account, or by any other manner as set forth under section 101(54) of the Bankruptcy Code or section 270 of the New York Debtor & Creditor Law.

5. “**You**” or “**your**” means, or refers to, Stanley Shapiro.

6. “**David Shapiro**” means your youngest son, David Shapiro.

REQUESTS FOR ADMISSION IN DISPUTE

21. Admit that attached hereto as **Exhibit 4** is a true and accurate copy of a note which, although it may contain other handwriting, was written by you, in your capacity as trustee of, among other trusts, the David Shapiro 1989 Trust.

22. Admit that as set forth in the note, a copy of which is attached hereto as **Exhibit 4**, you instructed BLMIS to begin, as of January of 1998, making monthly distributions or Transfers in the amount of \$7,500.00 from the Portfolio Account.

28. Admit that attached hereto as **Exhibit 6** is a true and accurate note which, although it may contain other handwriting, was written by you, in your capacity as the trustee of, among other trusts, the David Shapiro 1989 Trust.

29. Admit that as set forth in the note, a copy of which is attached hereto as **Exhibit 6**, you instructed BLMIS to begin, as of January of 2000, making monthly distributions or Transfers in the amount of \$10,000.00 from the Portfolio Account.

37. Admit that in April of 2003, you arranged for BLMIS to wire the sum of \$1,200,000.00 into a bank account held by David Shapiro from the Portfolio Account.

39. Admit that attached hereto as **Exhibit 8** is a true and accurate copy of a note which, although it may contain other handwriting, was written by you.